

WATSONSerial No. **09/529,201****REMARKS**

Applicant incorporates by reference the entirety of the Amendment filed October 23, 2001, including the newly added claims and the arguments for support and patentability of the pending claims. Additionally, after discussions with Examiner Duong and Interference Specialist Phan, Applicant filed a "Withdrawal of Final" request again requesting that an interference be declared between the '906 patent and this pending application. Having recently learned that a continuation of the '906 patent has issued as the '999 patent, the above amendment copies the 7 claims of the '999 patent (as claims 96-102 in this application) and requests that the '999 patent be included in the declared interference (a copy of the '999 patent is attached) for the purpose of provoking an interference with that patent.

AMENDED REQUEST FOR DECLARATION OF INTERFERENCE

Pursuant to 37 CFR §1.607, applicant respectfully requests a declaration of an interference involving the present applicant as senior party and the purported inventor of U.S. Patent 6,204,906 and U.S. Patent 6,380,999 as junior party. The support for the Declaration of Interference with U.S. Patent 6,204,906 is fully set forth in the Amendment filed October 23, 2001 and is incorporated herein by reference.

§1.607(a)(1) Identifying the Patent

The patent with which an interference should be declared is U.S. Patent 6,380,999 B1 issued April 30, 2001 to Lawrence E. Tannas, Jr., which was a continuation of U.S.

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Patent 6, 204,906 and was based upon continuation application Serial No. 09/812,370, filed March 16, 2001 (hereinafter the '999 patent).

§1.607(a)(2) Presenting a Proposed Count

Applicant proposes that the interference go forward with the following proposed count;

A method of changing the physical shape of an electronic display, wherein the display comprises a front plate, a back plate, and a perimeter seal spacing apart the plates, and wherein image-generating medium is sealed to an area between the plates and within the borders of the perimeter seal, the method comprising the steps of:

cutting the display along desired dimensions resulting in a target display portion and an excess display portion, thereby breaking the perimeter seal of the display; and

applying a first seal between the plates along an exposed edge of the target display portion, the first seal creating a barrier to prevent the image-generating medium from escaping out of the area between the plates.

The above proposed count, corresponds identically to Claim 1 of the '999 patent and claim 96 in this application. The only difference between the proposed count and the count previously proposed in the October 23, 2001 Amendment is that the language "the first seal comprising an adhesive having mechanical properties for preserving cell spacing between the front and back plates" present in the previously proposed count has been deleted in the above proposed count.

As a result, the above proposed count is broader than the previously proposed count and is proposed as a count for an interference between the present application and both the '906 and '999 patents.

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§1.607(a)(3) Identifying at Least One Claim in the Patent Corresponding to the Proposed Count

Claim 1 in the '999 patent corresponds identically with the above proposed count and claims 2-7 correspond to the count in as much as they are presumed to be directed to the same invention as that of the count.

§1.607(a)(4) "Identifying at Least One Claim Already Pending in its Application That Corresponds to the Proposed Count"

Newly added claim 96 in the above-identified Amendment corresponds identically with the above proposed count and claims 33-52, 54-95 and 97-102 correspond to the count and are directed towards the same invention.

§1.607(a)(5) "Applying the Terms of Any Application Claim . . . To The Disclosure of the Application"

Previously considered claims 33-52 correspond to the count as being directed to the same invention (the Examiner has not indicated any question as to support for these claims in the present specification). Previously submitted claims 53-95 in the present application correspond to the count, in that each of claims 54-95 either depends upon claim 53 which corresponds substantially with the count (with the exception of the "first seal" phrase noted above). Independent claim 53 corresponding to the previously proposed count has been allowed in the outstanding official action. In view of the PTO allowance of claim 1 in the '999 patent and independent claim 96 which corresponds identically thereto, it is similarly believed to be allowable. Claims 97-102 correspond

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substantially with the count and are method claims claiming the same invention as claim 96.

Applicant previously applied the terms of the application claims 53-95, which correspond identically with claims 1-43 in the '906 patent, with the disclosure in the present application in the separate Support for New Claims Chart attached as Exhibit 1 to the October 23, 2001 Amendment. Applicant applies the terms of the application claims 96-102, which correspond identically with claims 1-7 in the '999 patent, with the disclosure in the present application in the separate Support for New Claims Chart attached hereto as Exhibit 1.

§1.607(a)(6)

The '999 patent issued on April 30, 2002 and the above-identified newly submitted claims 96-102 are submitted for consideration on the filing date of this Amendment, clearly less than one year after the issue date of the '999 patent. Accordingly, the requirements of 35 USC §1.35(b) have been met.

Watson Should Be Designated as Senior Party

The '999 patent is a continuation of the '906 patent, which in turn is based upon application Serial No. 09/274,427 which was filed on March 22, 1999. However, the present application (copying claims from the '906 and '999 patents) is a national phase entry of PCT/GB98/02586 filed on August 27, 1998 which itself claims priority from GB 9814577.4 filed July 7, 1998 and GB 9721804.4 filed October 15, 1997. As noted above,

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the PTO has confirmed receipt of the claim for priority and receipt of the certified copies of the priority documents in the previously outstanding official action (paper number 13). Applicant Watson should be accorded benefit of its earlier GB priority dates. The US PTO has constructively received the GB priority documents. Should the Examiner require additional certified copies of these priority documents in order to further perfect applicant's benefit of British priority, notice to the undersigned is respectfully requested.

It is noted that both British priority dates, as well as the PCT International filing date, predate the filing date of the earliest Tannas application (resulting in the '906 patent) by almost a year or more. Therefore, in any interference declared between the present pending application and the '906 and '999 patents, applicant Watson should be designated the senior party.

Having met each and every one of the requirements set out in Rule 607(a) for an applicant's request for an interference, the Interference between the senior party, Watson, and application No. 09/529,201, on the one hand, and the junior party, Tannas and USP 6,204,906 B1 and USP 6,380,999, on the other hand, should promptly be declared.

Conclusion

The pending and newly written claims clearly define over the prior art in that they disclose a method and apparatus for modifying an existing finished liquid crystal display to provide a smaller liquid crystal display without the need to custom design the smaller display from scratch. All of claims 33-102 cover this specific feature and are believed patentable over the cited prior art. Additionally, the applications resulting in the '906 and

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'999 patents were filed long after the filing of the applicant's GB application priority documents and even the subsequent International PCT application.

Accordingly, claims 33-102 are patentable to the present inventor Watson. Based upon the present record, Watson has priority based upon the GB applications over a year earlier than the filing dates of the '906 and '999 patents. Watson should be designated as senior party in this interference.

Having responded to all objections and rejections in the outstanding official action, it is submitted that claims 33-102 are in condition for allowance and notice to that effect is respectfully requested. Additionally, in view of the identical nature of present claim 96 and claim 1 in the '999 patent, an interference should be promptly declared in order to correct the public record as to whom was the first inventor of the subject matter of the proposed count.

Claim Support Chart

Newly Added Claims 96-102 (Identical to '999 Patent Claims 1-7)	Corresponding Basis in Watson Application SN 09/529,201
<p>96. A method for changing the physical shape of an electronic display, wherein the display comprises a front plate, a back plate, and a perimeter seal spacing apart the plates, and wherein image-generating medium is sealed in an area between the plates and within the borders of the perimeter seal, the method comprising the steps of:</p> <p>cutting the display along desired dimensions resulting in a target display portion and an excess display portion, thereby breaking the perimeter seal of the display; and</p> <p>applying a first seal along an exposed edge of the target display portion, the first seal creating a barrier to prevent the image-generating medium from escaping out of the area between the plates.</p>	<p>Method involves changing the shape by "removing an excess region of a pre-manufactured liquid crystal display by cutting the first and second plates to isolate the excess region of the first and second plates and to expose cut edges along the operative areas of the first and second plates." Page 2, lines 1-6</p> <p>The original display "comprises a liquid crystal sealed between first and second parallelly spaced transparent plates" Page 2, lines 20-21.</p> <p>"cutting the first and second plates to isolate the excess region of the first and second plates and to expose cut edges along the operative areas of the first and second plates." Page 2, lines 1-6</p> <p>"the cut edges of the glass plates 12 and 13 are sealed by applying a bead of ultra-violet curing liquid crystal display sealant adhesive, and then curing with an ultra-violet light source." Page 13, lines 5-7</p>
<p>97. The method of claim 96, further comprising:</p> <p>scoring a polarizer attached to an upper surface of the front plate resulting in a target polarizer portion and an excess polarizer portion; and</p> <p>removing the excess polarizer portion from the display before performing the cutting step.</p>	<p>"Patterned light polarizing substrates 15, 16 are respectively adhered to the outer surfaces of the glass plates 12, 13." Page 9, lines 6-7. Also, "a fine tooth saw may be used to cut through the vertical driver card 20 along the line X-X." Page 10, lines 9-10. Further, while the specification anticipates leaving the polarizer bonded in place and removed when the excess display region is removed, it also suggests "Optionally, a narrow strip of the light polarizing substrate 15, defined by the chained line 22 and a parallelly-spaced chained line 25 on the opposite side of the line X-X, is then removed." Page 10, lines 19-20.</p> <p>"For example, a scalpel can be used to cut along the lines 22, 25 so that the narrow strip of the</p>

Newly Added Claims 96-102 (Identical to '999 Patent Claims 1-7)	Corresponding Basis in Watson Application SN 09/529,201
	light polarizing substrate 15 can be peeled off to expose the glass plate 12 which is then cleaned to remove all traces of the adhesive that was used to bond the strip of the light polarizing substrate 15 to the glass plate 12. Page 10, line 22 - Page 11, line 1. "By fracturing the glass plates 12 and 13 along the line X-X, the excess region 23 of the liquid crystal display 10 can be removed to expose cut edges of the glass plates 12 and 13." Page 12, lines 1-2.
<p>98. The method of claim 96, wherein the display further comprises</p> <p>electronic circuits for operating the display, and</p> <p>wherein the cutting step comprises cutting at least some of the electronic circuits.</p>	<p>"driver cards 19 & 20" page 9, line 19.</p> <p>"A laser, not shown, is then used to cut through glass plate 12 and glass plate 13" page 14, line 21.</p>
<p>99. The method of claim 96, further comprising modifying the electronic circuits on the target display portion to retain the basic functionality of the display.</p>	<p>"one of the vertical cards 20 is cut . . . This cut must be beyond any TAB 21 carrying connections to the operative region 24 that are to be retained," page 10, lines 6-11.</p>
<p>100. A method for changing the physical shape of an electronic display, wherein the display comprises a front plate, a back plate, and a perimeter seal spacing apart the plates, and wherein image-generating medium is sealed in an area between the plates and within the borders of the perimeter seal,</p> <p>the display further comprising electronic circuits for operating the display,</p> <p>the method comprising the steps:</p> <p>cutting the display along desired dimensions</p>	<p>Method involves changing the shape by "removing an excess region of a pre-manufactured liquid crystal display by cutting the first and second plates to isolate the excess region of the first and second plates and to expose cut edges along the operative areas of the first and second plates." Page 2, lines 1-6</p> <p>The original display "comprises a liquid crystal sealed between first and second parallelly spaced transparent plates" Page 2, lines 20-21.</p> <p>"driver cards 19 & 20" page 9, line 19.</p> <p>"A laser, not shown, is then used to cut through</p>

Newly Added Claims 96-102 (Identical to '999 Patent Claims 1-7)	Corresponding Basis in Watson Application SN 09/529,201
resulting in a target display portion and an excess display portion, thereby cutting at least some of the electronic circuits; and applying a first seal along an exposed edge of the target display portion.	glass plate 12 and glass plate 13" page 14, line 21. "the cut edges of the glass plates 12 and 13 are sealed by applying a bead of ultra-violet curing liquid crystal display sealant adhesive." page 13, lines 5-6
101. The method of claim 100, further comprising reestablishing electrical continuity for the electronic circuits that are cut.	"Where more complex circuitry exists and the card drivers cannot simply be cut, the process described above can be limited to the technique for cutting the transparent plates, the driver cards then being re-engineered or repositioned using flexible circuit extensions." page 16, lines 17-20.
102. The method of claim 101, wherein the reestablishing electrical continuity step comprises attaching new COGS, TABS, or VLSI circuits to the display.	"A series of ribbon connectors or TABs 21 electrically interconnect the driver cards 19 and 20 with the various portions of the conductive layers 17 and 18" page 9, lines 18-20.